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*Attorneys for Plaintiff
Johnny L. Kendrick, Jr.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

* * *

JOHNNY L. KENDRICK, JR.,

CLARK COUNTY, a political subdivision of the State of Nevada; JOHN MARTIN in his official and/or individual capacities; PATRICK SCHREIBER in his official and/or individual capacities; CAROLYN BANKS, in her official and/or individual capacities; and, SANDY JEANTETE, in her official and/or individual capacities,

Case No.: 2:18-cv-00781-JAD-GWE

**STIPULATION AND ORDER TO
EXTEND PLAINTIFF'S DEADLINE
TO RESPOND TO DEFENDANT'S
MOTION TO DISMISS (ECF NO. 21)**

(First Request)

Pursuant to Local Rule (“LR”) IA 6-1, LR IA 6-2, and LR 7-1, Plaintiff, Johnny L. Kendrick, Jr. (herein “Plaintiff”), by and through his undersigned counsel, James P. Kemp, Esq., and Victoria L. Neal, Esq., of the law firm of Kemp & Kemp, and Defendants, Clark County, *et al.*, by and through its undersigned counsel, Steven B. Wolfson, District Attorney, and Scott R. Davis, Deputy District Attorney, hereby agree to extend the time for Plaintiff to file a response to Defendants’ Motion to Dismiss (ECF No. 21), up to and including September 19, 2018. The

1 present deadline is September 12, 2018. Hearing on this matter is set for October 15, 2018. This
2 is the parties' first request for an extension of time to respond to Defendants' Motion to Dismiss.
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4 Plaintiff's counsel would like the additional time to thoroughly review and conduct the
5 required research of Defendants' position and case law in order to appropriately and completely
6 respond to their arguments. Both of Plaintiff's counsel have been extraordinarily busy including,
7 but not limited to, attending a two-day DIR conference, drafting an opening brief to the Ninth
8 Circuit Court of Appeals, drafting a writ of certiorari to the United States Supreme Court,
9 drafting an opening brief to the Supreme Court of Nevada, drafting complaints for which the
10 Right To Sue (EEOC) deadlines were to expire, responding to discovery requests, drafting initial
11 disclosures, drafting additional motions or replies including a motion to enforce, client meetings
12 for deposition and ENE prep, court appearances, and the intervening Labor Day holiday.
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1 Therefore, the parties agree that an extension of time is appropriate.

2 **IT IS SO STIPULATED:**

3 Dated: September 10, 2018.

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5 Dated: September 10, 2018.

6 Respectfully submitted,

7 Respectfully submitted,

8 /s/ Victoria L. Neal

9 JAMES P. KEMP, ESQ.
VICTORIA L. NEAL, ESQ.
KEMP & KEMP

10 Attorneys for Plaintiff
JOHNNY KENDRICK, JR.

/s/ Scott R. Davis

STEVEN B. WOLFSON
DISTRICT ATTORNEY
SCOTT R. DAVIS
DEPUTY DISTRICT ATTORNEY

11 Attorneys for Defendant
CLARK COUNTY, JOHN MARTIN, PATRICK
SCHREIBER, SANDY JEANTETE and
CAROLYN BANKS

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14 **IT IS SO ORDERED.**

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UNITED STATES DISTRICT COURT JUDGE
19 JENNIFER A. DORSEY

20 Dated: September 10, 2018.